

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MARK W. DOBRONSKI, an individual,

Case #. 5:23-cv-10331

Plaintiff,

Judge Judith E. Levy

vs.

TOBIAS & ASSOCIATES INC, GREAT
WESTERN INSURANCE COMPANY,
et. al.,

Magistrate Judge Anthony P. Patti

Defendants.

**DEFENDANT GREAT WESTERN INSURANCE COMPANY'S MOTION
FOR EXTENSION OF TIME TO APRIL 17, 2023 TO RESPOND TO
PLAINTIFF'S COMPLAINT**

Defendant GREAT WESTERN INSURANCE COMPANY ("GWIC"), by and through its attorneys moves for an extension to April 17, 2023 to respond to Plaintiff's Complaint pursuant to Fed. R. Civ. P. 6(b) to enable Defendant to evaluate global settlement and to place all defendants on the same track in this matter. Defendant refers this Court to the accompanying Brief in Support of Defendant's Motion.

Pursuant to Eastern District of Michigan Local Rule 7.1, GWIC, as movant, emailed Mr. Dobronski on March 31, 2023 regarding the relief requested in this motion and left a voicemail message on April 3, 2023 at Mr. Dobronski's telephone number listed on the Complaint but was unable to reach Mr. Dobronski to meet and confer on the motion.

Dated: April 4, 2023

Respectfully submitted,

GREAT WESTERN INSURANCE
COMPANY, Defendant

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MARK W. DOBRONSKI, an individual,

Case 5:23-cv-10331

Plaintiff,

vs.

TOBIAS & ASSOCIATES INC, GREAT
WESTERN INSURANCE COMPANY,
et. al.,

Defendants.

**BRIEF IN SUPPORT OF GWIC'S MOTION FOR AN EXTENSION OF
TIME TO APRIL 17, 2023 TO RESPOND TO PLAINTIFF'S COMPLAINT**

CONCISE STATEMENT OF ISSUES PRESENTED

Whether this Court should extend for good cause the time by which Defendant Great Western Insurance Company shall answer, respond, or otherwise plead to Plaintiff's Complaint to April 17, 2023, because additional time is necessary for Defendant and its counsel to confer regarding a global settlement demand recently forwarded to Defendant's counsel and to keep all Defendants on the same track regarding their responsive pleadings to Plaintiff's Complaint.

Defendant's answer: "Yes."

CONTROLLING OR MOST APPROPRIATE AUTHORITY

Fed. R. Civ. P. 6(b)

I. INTRODUCTION

Defendant GWIC current deadline to respond to Plaintiff's Complaint is April 4, 2023. The remaining defendants in this matter have each obtained an extension to April 17, 2023 to respond to the Complaint. GWIC's counsel was recently made aware of a global settlement demand in this matter and needs additional time to evaluate the demand and to prepare an appropriate response to the Complaint.

II. ARGUMENT

Good cause exists for this Court to grant GWIC's request to extend the response deadline to April 17, 2023. Under the Federal Rules of Civil Procedure:

When an act may or must be done within a specified time, the court may, for good cause, extend the time:

(A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires.

Fed. R. Civ. P. 6(b).

GWIC and its counsel require additional time to review the global settlement demand and to prepare an appropriate response to the Complaint. Plaintiff will not suffer any prejudice if the Court grants GWIC's request as each of the remaining defendants have secured an extension to April 17, 2023 and extending GWIC's deadline to respond to the Complaint to April 17, 2023 would ensure that all parties are on the same track.

WHEREFORE, Defendant GREAT WESTERN INSURANCE COMPANY respectfully requests an extension of time to on or before April 17, 2023 to respond to Plaintiff's Complaint.

Dated: April 4, 2023

Respectfully submitted,

GREAT WESTERN INSURANCE COMPANY, Defendant

By: /s/ Jennifer W. Weller

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CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2023 I electronically filed with the Clerk of the U.S. District Court, Eastern District of Michigan, the foregoing Motion for Extension by using the CM/ECF system, which will send notification of such filing(s) to all attorneys of record and via U.S. Mail, First Class to all non-attorneys:

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/s/*Jennifer W. Weller*
Jennifer W. Weller